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Kathleen Baskin, P.E.
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Dear Ms. Baskin,

I am a citizen of Westfield, Massachusetts. I care deeply about the wild and scenic Westfield River and the salmon it supports, and I would like to submit the following comments and photos in regard to the safe yield determination for the Westfield River Basin. My husband and I took multiple photos of the river in September, 2010, when the river was quite low. I had in the back of my mind the proposed withdrawals for the Russell Biomass plant when I first started becoming concerned about withdrawal levels, and since then, I have tried to learn about and understand the current policies that are being set with regard to "safe yield".

From what I can read, the Sustainable Water Management Initiative determined safe yield of 98.8 mgd for the Westfield River basin, which includes a 14.9 mgd reservoir storage credit. This credit appears to be granted because they expect that during dry times they will be releasing water stored in reservoirs. But, as you can see in the pictures we took at the Littleville Reservoir during the 2010 drought, water doesn't seem to be released from reservoirs in the Westfield River basin. Are there any downstream release requirements? If not, are the safe yield numbers being distorted by assuming there are such releases?

I did some research on the internet, and found that The Cobble Mountain Reservoir, the biggest reservoir in the Westfield River watershed, has no downstream release requirements either (see http://www.pvpc.org/resources/landuse/wap_final_small.pdf). Consequently, the Little River, which flows

from the Cobble Mountain Reservoir to the Westfield River (see attached map of the watershed), suffers from erratic flow. Why would you award a storage credit if the stored water is not utilized to ensure minimum flow during dry weather so fish can survive?

The SWMI formula for safe yield is "55% of annualized Q90 drought flow plus reservoir storage credit." If I am correct, 55% of annualized Q90 drought flow for the Westfield River is 83.9 mgd. We all understand that there can be a large fluctuation, with large flows and low flows at different times. Doesn't it seem that the safe yield calculation is claiming that the flows are similar in the wet and dry times because they are assuming that typical spring flood water is stored and later released at dry time? If that is the case, then they are depending on that reservoir storage to come up with that number, and it would be counting it twice to grant a reservoir storage credit.

With respect to Russell Biomass, DEP awarded a water withdrawal permit to the Russell Biomass power plant on the condition that withdrawals would have to decrease when the combined flow at the three USGS flow gauges upstream of the power plant goes below 19.2 cfs, and cease completely if the gauges go to 17.8 cfs. On September 16, 2010, the gauges went to 18.7 cfs, low enough that the power plant would have had to decrease its withdrawals.

The condition in the permit awarded by DEP to the power plant seems to admit that the river cannot tolerate more withdrawal than is currently occurring. However, the safe yield proposed by SWMI for the Westfield basin is more than double current withdrawals. How can that be considered "safe" ?

We've just received an invitation to help with the restoring of Atlantic salmon to the Westfield River. A tremendous amount of money and resources and energy are devoted to this goal. I am concerned that all of that will be lost if the SWMI proposed safe numbers are allowed to stand, allowing increased water withdrawals in the basin.

I respectfully request that safe yield for the Westfield River basin be set significantly lower than current withdrawals to protect this spectacular resource for future generations. Isn't that what "sustainable" means?

Sincerely yours,

Claudia Hurley

The Littleville Reservoir is an impoundment of the Middle Branch of the Westfield River used for flood control, recreation and water supply (photo taken Sept. 13, 2010 during a moderate drought)

The Littleville Dam outflow on Sept. 13, 2010 during a moderate drought.

Middle Branch of the Westfield River downstream of the Littleville Reservoir on 9/13/2010, when flow at the USGS Huntington gauge on the Middle Branch was 8.2 cfs.

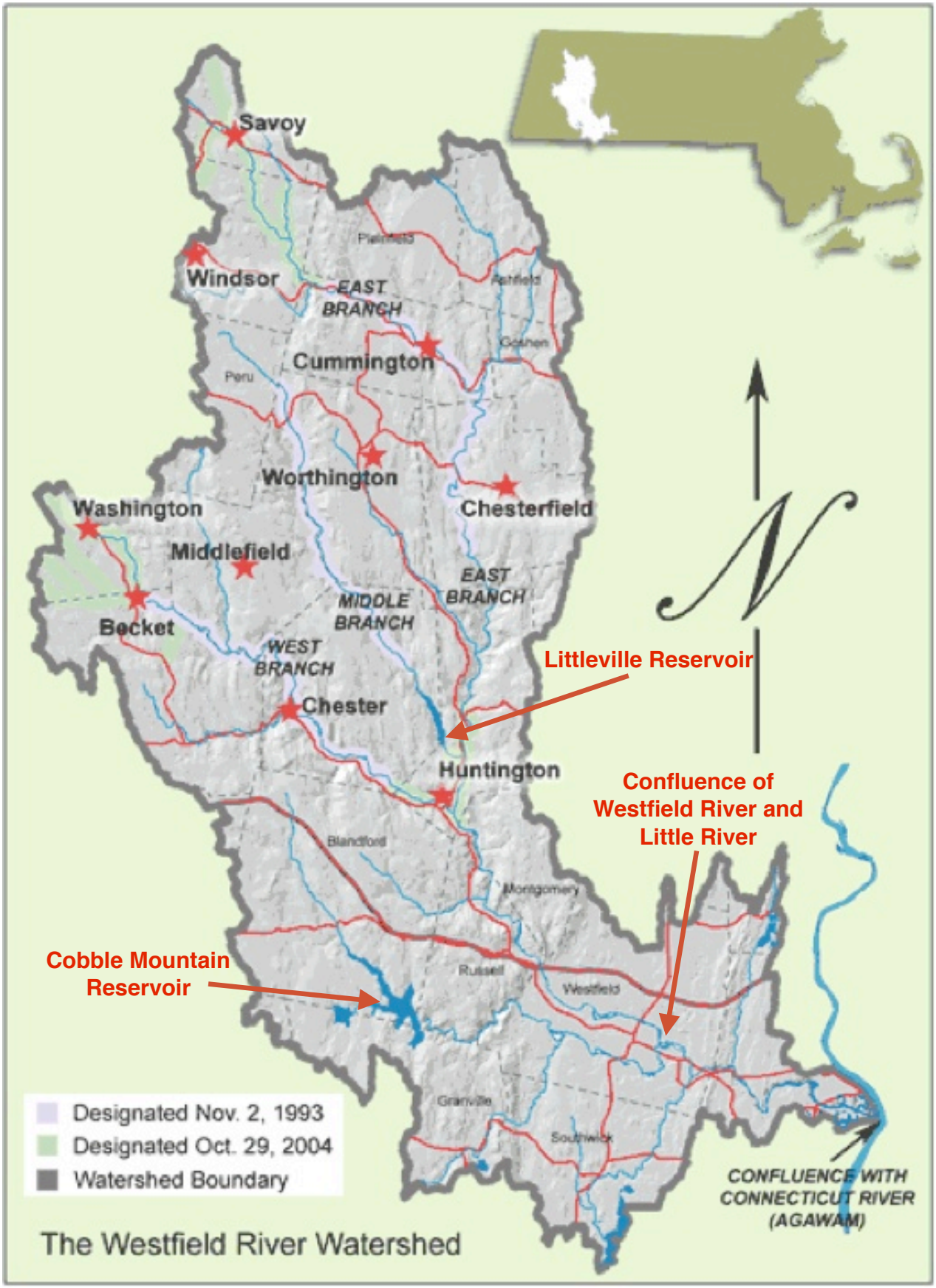
Flow of 24.27 cfs was measured in the Westfield River downstream of Russell on Sept. 14, 2010. Combined flow at the three upstream USGS gauges on that date was 19.6 cfs. Note the mats of algae resulting from concentration of nutrients and warm water temperatures. Algae sucks oxygen out of the water at night, and can lead to fish kills. There were anecdotal reports of dead fish in the river during the moderate drought of 2010.

Littleville Reservoir on Sept. 4, 2011, one week after the big storm of August 28, 2011. Note the high water mark on the trees along the far shore.

Littleville Dam outflow on Sept. 4, 2011, one week after the big storm of August 28

Knightville "Reservoir" (East Branch of the Westfield River) on Sept. 4, 2011, one week after the Aug. 28 storm. Note the high water mark along the shoreline. The reservoir emptied within one week following the storm. The dam was constructed for flood control purposes, so the reservoir is normally kept empty to anticipate major floods. Therefore, this reservoir is useless for maintaining flow in the Westfield River during a drought.

On September 13, 2010 there was not even enough flow in the Westfield River to paddle a kayak, yet SWMI proposes safe yield for the basin that is more than double current withdrawals.


Savoy
Windsor
EAST BRANCH
Cummington
Peru
Worthington
Chesterfield
Washington
Middlefield
Becket
MIDDLE BRANCH
EAST BRANCH
WEST BRANCH
Chester
Littleville Reservoir
Huntington
Confluence of Westfield River and Little River
Blandford
Montgomery
Cobble Mountain Reservoir
Russell
Westfield
Granville
Southwick
CONFLUENCE WITH CONNECTICUT RIVER (AGAWAM)
N
Designated Nov. 2, 1993
Designated Oct. 29, 2004
Watershed Boundary
The Westfield River Watershed